

**LAW OFFICES OF DALE K. GALIPO**

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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TYLER KAI BRYANT,

Plaintiff,

v.

DUSTIN HEERSCHKE; and DOES 1  
through 10, inclusive.

Defendants.

Case No. 2:23-cv-03434 JLS (PVCx)

Honorable Josephine L. Staton

**(AMENDED) JOINT STIPULATION  
TO ALLOW PLAINTIFF TO  
AMEND HER COMPLAINT TO  
NAME THE DEPUTIES WHO USED  
FORCE AND PARTICIPATED IN  
HER ARREST IN PLACE OF DOE  
DEFENDANTS 1-3**

*[(Proposed) Redlined First Amended  
Complaint and (Proposed) Order Filed  
Concurrently Herewith]*

**TO THIS HONORABLE COURT:**

**IT IS HEREBY STIPULATED** by and between Plaintiff TYLER KAI  
BRYANT and Defendant DUSTIN HEERSCHKE (“the Parties”), by and through  
their respective attorneys of record, as follows:

- 1           1. Plaintiff filed her Complaint on May 5, 2023. At the time of the filing of  
2           her original Complaint, Plaintiff was genuinely ignorant of the names of  
3           all but one of the Ventura County Sheriff's Department employee(s)  
4           and/or individuals who participated in her detention and arrest, and of all  
5           of the Ventura County Sheriff's Department employees who used force,  
6           during the incident giving rise to this lawsuit. Subsequently, after the  
7           parties exchanged their initial disclosures and initial discovery, Plaintiff  
8           discovered information that, during the incident giving rise to this lawsuit,  
9           Deputies Bradley Bordon and Eric Wiatt are the additional Ventura  
10          County Sheriff's Department employees who used force; that Deputies  
11          Bordon, Wiatt, and Jody Desjardins are the additional Ventura County  
12          Sheriff's Department employees who participated in Plaintiff's detention;  
13          and that Deputy Desjardins is the additional Ventura County Sheriff's  
14          Department employee who participated in Plaintiff's arrest.
- 15          2. The Parties agree that Plaintiff may file an amended complaint for the  
16          primary purpose of naming Deputies Bradley Bordon, Eric Wiatt, and  
17          Jody Desjardins as individual defendants. A copy of Plaintiff's proposed  
18          First Amended Complaint is attached hereto as "Exhibit A."
- 19          3. Plaintiff shall have 7 days to file her First Amended Complaint after the  
20          Court grants her leave. Defendants shall have 21 days thereafter to file a  
21          responsive pleading.

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23          IT IS SO STIPULATED.

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DATED: October 16, 2023

**LAW OFFICES OF DALE K. GALIPO**

By: /s/ Benjamin S. Levine  
Dale K. Galipo  
Benjamin S. Levine<sup>1</sup>  
*Attorneys for Plaintiff Tyler Kai Bryant*

DATED: October 16, 2023

**LAWRENCE BEACH ALLEN & CHOI,  
PC**

By: /s/ Rocco Zambito, Jr.  
James S. Eicher, Jr.  
Rocco Zambito, Jr.  
*Attorneys for Defendant Dustin Heersche*

<sup>1</sup> Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.